

Application Serial No. 09/703,213
Attorney Docket No. 10199-005-999

REMARKS

In the first Office Action of February 20, 2004, claims 1-24 were rejected under 35 U.S.C. 103(a) as unpatentable over Beser et al (U.S. 6,523,068) and Peckover (U.S. 6,119,101).

Applicants' invention is directed to a method for obscuring user access patterns in a computer network. An example of the kind of access patterns that are obscured by the present invention is the "click data" that can be tracked as a user visits a server computer with his or her browser.

In accordance with the invention, user access patterns are obscured in two ways. First, some access patterns are never made available to the server computer. This is accomplished by using a cache memory to store some of the information requested by the user computer. While the cache memory ultimately gets its information from the server computer, the cache memory will be able to service some of the user computer's repeated requests from its own memory contents and will not have to access the server computer. As a result, for these repeated requests, no access is made to the server computer and these parts of the user's access patterns are never made available to the server computer. See page 7, line 33 to page 8, line 11, of the specification.

Where the requested information is not available in the cache memory, a second technique is employed to obscure the user's access patterns to the server computer. In particular, the request is edited to obscure user identity information. See, step 165 of Fig. 2 and page 8, line 13, of the specification. As a result, anyone attempting to trace the request will have difficulty linking it to the user computer.

These features of applicants' invention are captured in the language of the claims. For example, method claim 1 requires a user request for information from another network member to be routed first to a cache memory and for the requested information to be provided if the cache memory contains the information without releasing the request to the network member. Further, claim 1 requires that if the cache memory does not contain the requested information, user identity information in the request is edited to obscure such information before the edited request is released to the network member.

Independent claims 11 and 19 which are directed to a computer program and to a system, respectively, are similar.

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In rejecting the claims, the Examiner relies on Beser for everything except details relating to the editing of user identity information to obscure the identity information. Beser, however, does not disclose applicants' claimed use of a cache memory.

Beser is directed to a method for hiding the destination and source addresses found in the header of message packets by encapsulating the message packets in other message packets. Thus, as illustrated in Fig. 20 or Fig. 24, a packet having a second header and a second payload is incorporated as the payload within another packet having a first header. Beser, however, does not disclose the use of a cache memory and in particular does not disclose the use of a cache memory that may store information requested by the user. Further, Beser does not disclose the use of a cache memory that returns the requested information if the information is in the cache memory, thereby avoiding release of the user request to a network member.

The Examiner asserts that the use of a cache memory is described at col. 7, lines 65-67 and col. 8 lines 1-14 of Beser. However, a review of these lines reveals that they simply describe how data is packetized and transmitted using the Internet Protocol. The Examiner also asserts that the operation of a cache memory is described at col. 18, lines 43-52. Again, however, such details are not taught in Beser. What is taught at col. 18, lines 43-52 is simply the examination of an IP packet 232 at network device 14 to determine if it includes the address of another device. Network device 14 is not a cache memory.

Peckover is relied upon only for the teaching of details about the editing of user information to obscure identity information. Peckover discloses a system of agents for representing buyers and sellers in ecommerce including a consumer personal agent, a provider personal agent, a decision agent and a demand agent. Peckover, however, does not disclose any use of a cache memory or the specific application to which the cache memory is put in applicants' invention.

In the absence of any teaching in Beser or Peckover of any use of a cache memory or the specific application to which the cache memory is put in applicants' invention, independent claims 1, 11 and 19 are patentable over the art cited.

Dependent claims 2-10, 12-18 and 20-27 are believed patentable for the same reason claims 1, 11 and 19 are patentable. Dependent claims 2, 3, 12, 13, 20 and 21 are believed patentable for the additional reason that they teach the use of an additional cache memory in the method, program and system of the present invention. In rejecting these claims, the Examiner relies on col. 8, lines 43-52, and col. 31, lines 37-45 of Beser, the same disclosure

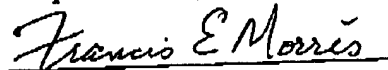
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on which the Examiner relies in rejecting claims 1, 11 and 19. However, network device 14 of Beser is not a cache memory and these lines do not disclose the use of two cache memories.

In light of the above remarks, the Applicant respectfully requests that the Examiner reconsider this application with a view towards allowance. The Examiner is invited to call the undersigned attorney if a telephone call could help resolve any remaining items.

Respectfully submitted,

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